

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

WILLIAM E. DUGAN, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 08 C 1011
	)	
MAHONEY & ASSOCIATES, LLC,	)	JUDGE ROBERT W. GETTLEMAN
an Illinois limited liability company,	)	
	)	
Defendant.	)	

**MOTION FOR ENTRY OF DEFAULT AND  
FOR AN ORDER DIRECTING AN AUDIT**

NOW COME Plaintiffs, by their attorneys, and move for entry of default and for an order directing an audit of the payroll books and records of MAHONEY & ASSOCIATES, LLC, an Illinois limited liability company, Defendant herein, said Defendant having failed to answer or otherwise plead to the Complaint and an audit being necessary to liquidate Plaintiffs' claims.

On July 8, 2008, the Summons and Complaint was served on the Registered Agent, Clinton Mahoney (by tendering a copy of said documents to his spouse) at his residence (a copy of the Notice of Filing and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on July 28, 2008. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default.

/s/ Catherine M. Chapman

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 26<sup>th</sup> day of August 2008:

Mr. Clinton Mahoney, Registered Agent/Manager  
Mahoney & Associates, LLC  
10809 Chaucer Drive  
Willow Springs, IL 60480-1148

/s/ Catherine M. Chapman \_\_\_\_\_

Catherine M. Chapman  
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